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9 IN THE UNITED STATES DISTRICT COURT
10 FOR THE NORTHERN DISTRICT OF CALIFORNIA
11 SAN FRANCISCO DIVISION
12

13 UNITED STATES OF AMERICA,

14 Plaintiff,

15 v.

16 KRISHNA VIRAMONTES,

17 Defendants.
18
19

Case No. CR 16-508 EMC

**STIPULATION AND [PROPOSED]
ORDER TO SET STATUS CONFERENCE
AND EXCLUDE TIME**

20
21 On November 14, 2017, the Court issued an order denying defendant Krishna Viramontes'
22 motion to suppress. No further status conference is currently set in this matter. Mr. Viramontes' counsel
23 Geoffrey Hansen is currently out of the office on medical leave, but will return shortly. To accommodate
24 Mr. Hansen's schedule and to allow for continuity of defense counsel and for effective preparation of
25 counsel, the parties jointly request that the Court set a status conference in this matter for January 10,
26 2018 at 2:30 p.m.

27 For the above reasons, the parties stipulate there is good cause – taking into account the public
28 interest in the prompt disposition of this case – to exclude the time from November 14, 2017 to January

1 10, 2018 from computation under the Speedy Trial Act, and that failing to exclude that time would
2 unreasonably deny the defendant and his counsel the reasonable time necessary for effective preparation
3 of counsel taking into account the exercise of due diligence, as well as continuity of defense counsel. 18
4 U.S.C. § 3161(h)(7)(A) and (B)(iv). The parties further agree that the ends of justice would be served by
5 excluding the time from November 14, 2017 to January 10, 2018 from computation under the Speedy
6 Trial Act and that the need for the exclusion outweighs the best interests of the public and the defendant
7 in a speedy trial.

8 SO STIPULATED.

9
10 November 16, 2017
11 Date

/s/
KAREN KREUZKAMP
Assistant U.S. Attorney

12
13 November 16, 2017
14 Date

/s/
JODI LINKER for GEOFFREY HANSEN
Attorney for Defendant VIRAMONTES

15
16 IT IS SO ORDERED.

17
18 11/17/17
19 Date

